

Exhibit 3

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Class Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CAPACITORS ANTITRUST LITIGATION

Master File No. 3:14-cv-03264-JD

THIS DOCUMENT RELATES TO:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF ERIC L. CRAMER
IN SUPPORT OF CLASS COUNSEL'S
APPLICATION FOR ATTORNEYS' FEES
AND REIMBURSEMENT
OF EXPENSES SUBMITTED ON
BEHALF OF BERGER & MONTAGUE,
P.C.**

I, ERIC L. CRAMER, declare and state as follows:

1. I am a member of Berger & Montague, P.C. ("the Firm"). I submit this Declaration in support of Class Counsel's interim application for attorneys' fees for services rendered to the class in the above-captioned litigation and for reimbursement of expenses reasonably incurred in the course of such representation. The time expended in preparing this Declaration is not included.

2. I have reviewed the Court's October 31, 2014 Order Appointing Interim Lead Class Counsel (Dkt. 319) ("Order"), including in particular the Order's provisions regarding fees, costs and expenses. The Firm has adhered to those provisions.

3. The Firm has acted as class counsel to Direct Purchaser Plaintiffs ("DPPs") in this class action. During the course of this litigation, the Firm has been involved in the following activities on behalf of the DPPs at the request and under the direction of Lead Counsel: briefing concerning FTAIA issues and the motions to dismiss, assisting with preparation for hearings and arguments, discussions

1 and analysis regarding litigation strategy, negotiating discovery provided by NEC TOKIN, analyzing
2 and synthesizing the voluminous conspiracy evidence, taking depositions of Defendants' employees,
3 and working with co-counsel and experts concerning issues relating to, *e.g.*, class certification and
4 damages. During the period from November 1, 2014 through September 30, 2016, the Firm performed
5 6,860.6 hours of work in connection with this litigation. Based upon the historical hourly rates charged
6 by the Firm, the lodestar value of the time is \$3,343,491.50. Attached hereto as Exhibit A is a chart
7 which indicates the attorneys, paralegals and staff who worked on this litigation, the number of hours
8 worked, the categories of their work and their respective lodestar values. Exhibit A was prepared from
9 contemporaneous, daily time records regularly prepared and maintained by the Firm and which have
10 been provided to Lead Counsel for review.

11 4. All of the services performed by the Firm in connection with this litigation were
12 reasonably necessary in the prosecution of this case. There has been no unnecessary duplication of
13 services for which the Firm now seeks compensation. The lodestar calculations exclude time spent
14 reading or reviewing work prepared by others or other information relating to the case unless related to
15 preparation for or work on a matter specifically assigned to the Firm by Lead Counsel. The rates at
16 which the Firm seeks compensation are its usual and customary hourly rates charged for this work.

17 5. During the period from November 1, 2014 through September 30, 2016, the Firm
18 incurred expenses in the sum of \$251,648.41. These expenses were reasonably and necessarily incurred
19 in connection with this litigation and are summarized in the chart attached as Exhibit B. Expense
20 documentation has been provided to Lead Counsel for review.

21 6. The expenses incurred are reflected on the books and records of the Firm. These books
22 and records are prepared from checks and expense vouchers which are regularly kept and maintained
23 by the Firm and accurately reflect the expenses incurred.

24 7. The Firm's compensation for the services rendered on behalf of the class is wholly
25 contingent. Any fees and reimbursement of expenses will be limited to such amounts as approved by
26 this Court.

27 I hereby affirm under penalty of perjury of the laws of the United States that the foregoing is
28 true and correct.

Dated: January 27, 2017

By: /s/ Eric L. Cramer
ERIC L. CRAMER

Berger Montague**Exhibit A**

<u>Timekeeper</u>	<u>Professional Status</u>	<u>Amount</u>
Gordon, Ruthanne	Partner	\$ 752,170.00
Kitagawa, Yukiyo	ParaLegal	\$ 573,390.50
Cramer, Eric	Partner	\$ 529,312.50
Enders, Candice	Partner	\$ 371,560.00
Caplan, Zachary	Associate	\$ 352,680.50
Klein, Joseph	Associate	\$ 286,485.00
Tompkins, Eugene	Associate	\$ 128,012.50
Mangiaracina, Frank	Associate	\$ 145,520.00
Markert, Karen	ParaLegal	\$ 74,321.00
Urban, Nick	Associate	\$ 67,200.00
Suter, Mark	Associate	\$ 41,589.50
Dell'Angelo, Michael	Partner	\$ 726.00
Cantor, Gary	Partner	\$ 18,514.00
Kabacinski, Jeffrey	ParaLegal	\$ 2,010.00
Grand Total		\$ 3,343,491.50

	Berger Montague		Exhibit B
		200,000.00	Assessments
		13,580.37	Commercial Copies / Internal Copies
		380.00	Court Fees/Filing Fees
		17,608.86	Computer Research
		125.28	Postage
			Professional Fees
			Witness Fees
		271.89	Telephone 1
		19,529.93	Travel
		152.08	Other (Hosting)
		251,648.41	TOTAL EXPENSES